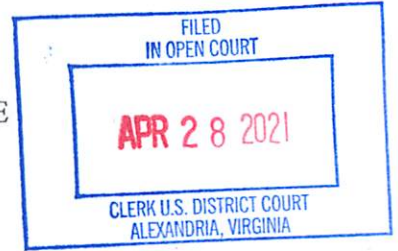


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA

v.

MATTHEW J. ERAUSQUIN,
a/k/a MATT HAMMOND

Defendant.

) No. 1:21-CR-49 CMH
)
) **Counts 1-6: Sex Trafficking a Minor**
) 18 U.S.C. § 1591(a)(1), (b)(2), (c)
)
) **Count 7: Production of Child Pornography**
) 18 U.S.C. § 2251(a)
)
) **Count 8: Transporting a Person Across**
) **State Lines for Purposes of Prostitution**
) 18 U.S.C. § 2421(a)
)
) **Counts 9-11: Coercion & Enticement**
) 18 U.S.C. § 2422(a)
)
) **Forfeiture**

INDICTMENT

April 2021 Term – At Alexandria

COUNT 1

Sex Trafficking of Victim J

THE GRAND JURY CHARGES THAT:

From on or about June 15, 2017 through on or about September 10, 2018, within the Eastern District of Virginia, in and affecting interstate commerce, the defendant, MATTHEW J. ERAUSQUIN, a/k/a “MATT HAMMOND,” did knowingly recruit, entice, harbor, transport, obtain, maintain, solicit, and patronize a minor herein referred to as VICTIM J, having had a reasonable opportunity to observe VICTIM J and knowing and in reckless disregard that VICTIM J was under the age of 18 years old and knowing and in reckless disregard that VICTIM J would be caused to engage in a commercial sex act.

(In violation of Title 18, United States Code, Section 1591(a)(1), (b)(2), and (c))

COUNT 2

Sex Trafficking of Victim G

THE GRAND JURY FURTHER CHARGES THAT:

From on or about June 15, 2017 through on or about July 2018, within the Eastern District of Virginia, in and affecting interstate commerce, the defendant, MATTHEW J. ERAUSQUIN, a/k/a “MATT HAMMOND,” did knowingly recruit, entice, harbor, transport, obtain, maintain, solicit, and patronize a minor herein referred to as VICTIM G, having had a reasonable opportunity to observe VICTIM G and knowing and in reckless disregard that VICTIM G was under the age of 18 years old and knowing and in reckless disregard that VICTIM G would be caused to engage in a commercial sex act.

(In violation of Title 18, United States Code, Section 1591(a)(1), (b)(2), and (c))

COUNT 3

Sex Trafficking of Victim S

THE GRAND JURY FURTHER CHARGES THAT:

From on or about July 21, 2017 through on or about November 2017, within the Eastern District of Virginia, in and affecting interstate commerce, the defendant, MATTHEW J. ERAUSQUIN, a/k/a "MATT HAMMOND," did knowingly recruit, entice, harbor, transport, obtain, maintain, solicit, and patronize a minor herein referred to as VICTIM S, having had a reasonable opportunity to observe VICTIM S and knowing and in reckless disregard that VICTIM S was under the age of 18 years old and knowing and in reckless disregard that VICTIM S would be caused to engage in a commercial sex act.

(In violation of Title 18, United States Code, Section 1591(a)(1), (b)(2), and (c))

COUNT 4

Sex Trafficking of Victim G.B.

THE GRAND JURY FURTHER CHARGES THAT:

From on or about August 4, 2017 through on or about November 2017, within the Eastern District of Virginia, in and affecting interstate commerce, the defendant, MATTHEW J. ERAUSQUIN, a/k/a "MATT HAMMOND," did knowingly recruit, entice, harbor, transport, obtain, maintain, solicit, and patronize a minor herein referred to as VICTIM G.B., having had a reasonable opportunity to observe VICTIM G.B. and knowing and in reckless disregard that VICTIM G.B. was under the age of 18 years old and knowing and in reckless disregard that VICTIM G.B. would be caused to engage in a commercial sex act.

(In violation of Title 18, United States Code, Section 1591(a)(1), (b)(2), and (c))

COUNT 5

Sex Trafficking of Victim I

THE GRAND JURY FURTHER CHARGES THAT:

From on or about April 1, 2019 through on or about April 24, 2019, within the Eastern District of Virginia, in and affecting interstate commerce, the defendant, MATTHEW J. ERAUSQUIN, a/k/a "MATT HAMMOND," did knowingly recruit, entice, harbor, transport, obtain, maintain, solicit, and patronize a minor herein referred to as VICTIM I, having had a reasonable opportunity to observe VICTIM I and knowing and in reckless disregard that VICTIM I was under the age of 18 years old and knowing and in reckless disregard that VICTIM I would be caused to engage in a commercial sex act.

(In violation of Title 18, United States Code, Section 1591(a)(1), (b)(2), and (c))

COUNT 6

Sex Trafficking of Victim E

THE GRAND JURY FURTHER CHARGES THAT:

From on or about September 1, 2019 through on or about October 9, 2019, within the Eastern District of Virginia and elsewhere, in and affecting interstate commerce, the defendant, MATTHEW J. ERAUSQUIN, a/k/a "MATT HAMMOND," did knowingly recruit, entice, harbor, transport, obtain, maintain, solicit, and patronize a minor herein referred to as VICTIM E, having had a reasonable opportunity to observe VICTIM E and knowing and in reckless disregard that VICTIM E was under the age of 18 years old and knowing and in reckless disregard that VICTIM E would be caused to engage in a commercial sex act.

(In violation of Title 18, United States Code, Section 1591(a)(1), (b)(2), and (c))

COUNT 7

Production of Child Pornography

THE GRAND JURY FURTHER CHARGES THAT:

From on or about July 21, 2017 through on or about November 19, 2020, in the Eastern District of Virginia and elsewhere, the defendant, MATTHEW J. ERAUSQUIN, a/k/a "MATT HAMMOND," did knowingly employ, use, persuade, induce, entice and coerce minors J., G., S., and G.B. to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct and the visual depiction was transported in and affecting interstate commerce and the visual depiction was produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means including by computer; to wit: videos with file names Escapade.mov, Escapade-2.mov, Escapade-3.mov, Escapade-4.mov, and Escapade-5.mov depicting oral sex and vaginal sexual intercourse.

(In violation of Title 18, United States Code, Section 2251(a))

COUNT 8

Transportation of a Person Across State Lines for Purposes of Prostitution

THE GRAND JURY FURTHER CHARGES THAT:

From on or about December 22, 2018 through on or about December 23, 2018, within the Eastern District of Virginia and elsewhere, the defendant MATTHEW J. ERAUSQUIN, a/k/a MATT HAMMOND, did knowingly transport an individual herein referred to as VICTIM G in interstate and foreign commerce with intent that VICTIM G engage in prostitution.

(In violation of Title 18, United States Code, Section 2421(a))

COUNT 9

Coercion and Enticement

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about March 1, 2020 through August 26, 2020 within the Eastern District of Virginia and elsewhere, the defendant, MATTHEW J. ERAUSQUIN, a/k/a MATT HAMMOND, knowingly persuaded, induced, enticed, and coerced Victim M to travel in interstate commerce, from Florida to the Eastern District of Virginia, to engage in prostitution.

(In violation of Title 18, United States Code, Section 2422(a))

COUNT 10

Coercion and Enticement

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about March 1, 2020 through on or about June 30, 2020, within the Eastern District of Virginia and elsewhere, the defendant, MATTHEW J. ERAUSQUIN, a/k/a MATT HAMMOND, knowingly persuaded, induced, enticed, and coerced Victim P to travel in interstate commerce, from Florida to the Eastern District of Virginia, to engage in prostitution.

(In violation of Title 18, United States Code, Sections 2422(a))

COUNT 11

Coercion and Enticement

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about May 1, 2019 through on or about September 1, 2019, within the Eastern District of Virginia and elsewhere, the defendant, MATTHEW J. ERAUSQUIN, a/k/a MATT HAMMOND, knowingly persuaded, induced, enticed, and coerced Victim P.W. to travel in interstate commerce, from Maryland to the Eastern District of Virginia and elsewhere, to engage in prostitution.

(In violation of Title 18, United States Code, Section 2422(a))

FORFEITURE NOTICE

The Grand Jury finds probable cause for forfeiture as described below pursuant to Federal Rule of Criminal Procedure 32.2:

Defendant MATTHEW J. ERAUSQUIN is hereby notified, pursuant to Federal Rule of Criminal Procedure 32.2(a), that upon conviction of the violations set forth in Counts 1 through 6 of this indictment, he shall forfeit to the United States, pursuant to 18 U.S.C. § 1594(d): (1) the defendant's interest in any property, real or personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of such violation, and any property traceable to such property; and (2) any property, real or personal, constituting or derived from, any proceeds that the defendant obtained, directly or indirectly, as a result of such violation, or any property traceable to such property.

Defendant MATTHEW J. ERAUSQUIN is hereby notified, pursuant to Federal Rule of Criminal Procedure 32.2(a), that upon conviction of the violations set forth in Count 7 of this indictment, he shall forfeit to the United States, pursuant to 18 U.S.C. §§ 2253(a): (1) any visual depiction described in 18 U.S.C. § 2251 *et seq.*; (2) any property real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and (3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

Defendant MATTHEW J. ERAUSQUIN is hereby notified, pursuant to Federal Rule of Criminal Procedure 32.2(a), that upon conviction of the violations set forth in Count 8 through 11 of this indictment, he shall forfeit to the United States, pursuant to 18 U.S.C. § 2428(a): (1) his interest in any property, real or personal, constituting or derived from proceeds he obtained, directly or indirectly, as a result of such violation; and (2) his interest in any property, real or

personal, that was used or intended to be used to commit or to facilitate the commission of such violation.

Pursuant to 21 U.S.C. § 853(p), defendant shall forfeit substitute property, if, by any act or omission of defendant's, the property referenced above cannot be located upon the exercise of due diligence; has been transferred, sold to, or deposited with a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

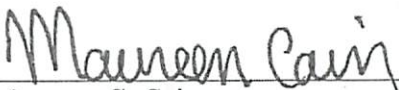
(Pursuant to Title 18, United States Code, Sections 1594(d), 2428(a), 2253(a), and Federal Rules of Criminal Procedure 32.2)

A TRUE BILL

Pursuant to the E-Government Act,
The original of this page has been filed
under seal in the Clerk's Office

FOREPERSON

RAJ PAREKH
ACTING UNITED STATES ATTORNEY


Maureen C. Cain
Assistant United States Attorney
Whitney Kramer
Special Assistant United States Attorney